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District of Nevada  
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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TIMOTHY CASEY,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00546-JAD-GWF

**JOINT STIPULATION FOR EXTENSION OF  
TIME AND [PROPOSED ORDER]**

**(THIRD REQUEST)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from November 30, 2018 to **December 11, 2018**. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Counsel has a family emergency on the date of the current filing deadline. Counsel also has over 75+ active matters, which requires two or more dispositive motions a week until mid-January. In addition, Counsel has active civil rights and representative misconduct matters that require immediate investigation. Counsel also has a Ninth Circuit brief due next week, which requires multiple levels of review. Due to Counsel's unexpected leave, Counsel became behind on her heavy workload. As such, Counsel needs additional time to adequately review the transcript

1 and properly respond to Plaintiff's Motion for Summary Judgment. Defendant makes this request in  
2 good faith with no intention to unduly delay the proceedings. The parties further stipulate that the  
3 Court's Scheduling Order shall be modified accordingly.  
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6 Respectfully submitted,

7 Dated: November 30, 2018

/s/ \*Cyrus Safa  
(\*as authorized by email on November 30, 2018)  
CYRUS SAFA  
Attorney for Plaintiff

8  
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10  
11 Dated: November 30, 2018

DAYLE ELIESON  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

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14  
15 By /s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

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18 **ORDER**

19 APPROVED AND SO ORDERED:

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22 DATED: 12/04/2018

  
HON. GEORGE FOLEY, JR.  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I, TINA L. NAICKER, certify that the following individual was served with a copy of the **JOINT STIPULATION FOR EXTENSION OF TIME AND [PROPOSED ORDER]** on the date and via the method of service identified below:

**CM/ECF:**

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Attorneys for Plaintiff

Respectfully submitted this 30th day of November 2018,

/s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant United States Attorney